

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

333 South Hope Street, 48th Floor

Los Angeles, CA 90071-1448

Telephone: (213) 620-1780

Fax: (213) 620-1398

Joseph F. Coyne, Jr./Cal. Bar No. 93707 – jcoyne@sheppardmullin.com

Michelle Sherman, Esq./Cal. Bar No. 136799 – msherman@sheppardmullin.com

Attorneys for Defendants, FORT JAMES

KRIEG, KELLER, SLOAN, REILLEY & ROMAN, LLP

114 Sansome Street, 7th Floor

San Francisco, CA 94104

Telephone (415) 249-8330

Fax (415) 249-8333

James C. Krieg/Cal. Bar No. 77069 – jkrieg@kksrr.com

Stan G. Roman/Cal Bar No. 87652 – sroman@kksrr.com

Attorneys for Defendant MCGUIREWOODS LLP

BEUS GILBERT PLLC

Attorneys At Law

4800 North Scottsdale Road, Suite 6000

Scottsdale, Arizona 85251

Telephone (480) 429-3000

Fax (480) 429-3100

Leo R. Beus/Ariz. Bar No. 002687 (Pro hac vice)

Malcolm Loeb/Calif. Bar No. 130026

Attorneys for Plaintiff, JEFFREY H. BECK,
LIQUIDATING TRUSTEE OF THE CROWN PAPER
LIQUIDATING TRUST

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CROWN PAPER COMPANY, *et al.*

Plaintiffs,

vs.

FORT JAMES CORPORATION, f/k/a
JAMES RIVER CORPORATION OF
VIRGINIA, *et al.*

Defendants.

Case No. C 05-0798 MMC

**STIPULATION AND ORDER
CONTINUING DEADLINES**

;

1 The following stipulation is entered into between Plaintiff Jeffrey H.
2 Beck, Liquidating Trustee of the Crown Paper Liquidating Trust ("Beck"),
3 defendant McGuireWoods LLP ("McGuireWoods") and Defendants Fort James
4 Corporation, f/k/a James River Corporation of Virginia; Fort James Operating
5 Company; Fort James Fiber Company, f/k/a James River Timber Corporation; and
6 Fort James International Holdings, Ltd., f/k/a James River International Holdings,
7 Ltd. (collectively, "Fort James").

8
9 The parties have agreed to continue by 45 days the discovery cut-off
10 dates and the last date for the filing of dispositive motions as indicated below.
11 Continuing these dates will not affect the court ordered trial date of February 5,
12 2007, and simply reflects an agreement that the parties were able to reach following
13 the June 16, 2006 hearing on Fort James' Motion to Modify the Amended Pretrial
14 Preparation Order.

15
16 THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS
17 FOLLOWS:

18
19 1. The non-expert discovery cut-off shall be continued from August
20 25, 2006 to October 9, 2006;

21
22 2. The last day to file motions to compel discovery shall be continued
23 from September 6, 2006 to October 18, 2006;

24
25 3. The last day for the parties to make disclosure of expert testimony
26 shall be continued from September 15, 2006 to October 30, 2006;

1 4. The last day for the parties to name rebuttal experts shall be
2 continued from October 6, 2006 to November 20, 2006;

3
4 5. The expert discovery cut-off shall be continued from October 27,
5 2006 to December 11, 2006; and

6
7 6. The last day to file dispositive motions shall be continued from
8 November 9, 2006 to December 22, 2006.

9
10 DATED: June 30, 2006

11 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

12
13 By /s/ Joseph F. Coyne, Jr.

14 Joseph F. Coyne, Jr.
15 Attorneys for Defendants
16 FORT JAMES AND RELATED ENTITIES

17 DATED: June 30, 2006

18 KRIEG KELLER SLOAN REILLEY & ROMAN LLP

19
20 By /s/ Stan G. Roman

21 STAN G. ROMAN
22 Attorneys for Defendant
23 MCGUIREWOODS, LLP

24 DATED: June 30, 2006

25 BEUS GILBERT PLLC

26 By /s/ Malcolm Loeb

27 Malcolm Loeb
28 Attorneys for Plaintiffs

ORDER

1
2
3 1. The non-expert discovery cut-off is continued from August 25, 2006
4 to October 9, 2006;

5
6 2. The last day to file motions to compel discovery is continued from
7 September 6, 2006 to October 18, 2006;


8
9 3. The last day for the parties to make disclosure of expert testimony is
10 continued from September 15, 2006 to October 30, 2006;

11
12 4. The last day for the parties to name rebuttal experts is continued
13 from October 6, 2006 to November 20, 2006;

14
15 5. The expert discovery cut-off is continued from October 27, 2006 to
16 December 11, 2006; and

17
18 6. As agreed at the July 7, 2006 telephone conference, the November
19 9, 2006 deadline for filing dispositive motions remains unchanged.

20
21 DATED: July 7, 2006

22
23
24 
25 Hon. Maxine M. Chesney
26 United States District Judge
27
28